

Mar 16, 2021

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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

BOBBY CHARLES OWENS,

Defendant.

2:21-CR-29-RMP

INDICTMENT

Vio: 18 U.S.C. §§ 1591(a)(1), (b)(2), 1594(a)  
Child Sex Trafficking and Attempted  
Child Sex Trafficking  
(Count 1)

18 U.S.C. § 2251(a), (e)  
Attempted Production of Child  
Pornography  
(Count 2)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)  
Receipt and Attempted Receipt of  
Child Pornography  
(Count 3)

18 U.S.C. §§ 1594, 2253  
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Between on or about February 27, 2019, and on or about March 28, 2019,  
within the Eastern District of Washington, the Defendant, BOBBY CHARLES

1 OWENS, in and affecting interstate commerce, did knowingly recruit, entice,  
2 harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit minor  
3 female C.S., knowing and in reckless disregard of the fact, and having had a  
4 reasonable opportunity to observe minor female C.S., that C.S. had not attained the  
5 age of 18 years and would be caused to engage in a commercial sex act, and did  
6 attempt the same, all in violation of 18 U.S.C. §§ 1591(a)(1), (b)(2), and 1594(a).  
7

8  
9 COUNT 2

10 Between or about February 27, 2019, and March 28, 2019, in the Eastern  
11 District of Washington, the Defendant, BOBBY CHARLES OWEN, did attempt to  
12 knowingly employ, use, persuade, induce, entice, and coerce minor female C.S. to  
13 engage in sexually explicit conduct for the purpose of producing a visual depiction  
14 of such conduct, knowing and having reason to know that such visual depiction  
15 would be transmitted using any means and facility of interstate commerce and  
16 using materials that had been mailed, shipped, and transported in and affecting  
17 interstate and foreign commerce by any means, including by computer, all in  
18 violation of 18 U.S.C. § 2251(a), (e).  
19

20  
21 COUNT 3

22 Between or about February 27, 2019, and on or about February 28, 2019, in  
23 the Eastern District of Washington, the Defendant, BOBBY CHARLES OWEN,  
24 did knowingly receive child pornography, as defined in 18 U.S.C. § 2256(8)(A),  
25 that had been mailed, shipped and transported in interstate commerce by any  
26 means, including by computer, to wit: visual depictions of minor female C.S.  
27 engaging in sexually explicit conduct, including the lascivious exhibition of her  
28 genitals and pubic area, and did attempt the same, all in violation of 18 U.S.C.  
§ 2252(a)(2)(A), (b)(1).



1 NOTICE OF FORFEITURE ALLEGATIONS

2 The allegations contained in this Indictment are hereby realleged and  
3 incorporated by reference for the purpose of alleging forfeitures.

4 Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of  
5 18 U.S.C. §§ 1591(a)(1), (b)(2), and/or 1594(a), as alleged in this Indictment, the  
6 Defendant, BOBBY CHARLES OWENS, shall forfeit to the United States of  
7 America, any property, real or personal, that was used or intended to be used to  
8 commit or to facilitate the commission of the offense and any property, real or  
9 personal, constituting or derived from any proceeds obtained, directly or indirectly,  
10 as a result of the offense.


11 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of  
12 18 U.S.C. § 2251(a), (e), and/or 18 U.S.C. § 2252A(a)(2)(A), (b)(1), as alleged in  
13 this Indictment, the Defendant, BOBBY CHARLES OWENS, shall forfeit to the  
14 United States of America any visual depiction described in 18 U.S.C. §§ 2251,  
15 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film,  
16 videotape, or other matter which contains any such visual depiction, which was  
17 produced, transported, mailed, shipped or received in violation of this chapter; any  
18 property, real or personal, constituting or traceable to gross profits or other  
19 proceeds obtained from such offense; and any property, real or personal, used or  
20 intended to be used to commit or to promote the commission of such offense, or  
21 any property traceable to such property.

22 If any of the property described above, as a result of any act or omission of  
23 the Defendant:

- 24
- 25
- 26 a. cannot be located upon the exercise of due diligence;
- 27 b. has been transferred or sold to, or deposited with, a third party;
- 28 c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

1 e. has been commingled with other property which cannot be  
2 divided without difficulty,  
3 the United States of America shall be entitled to forfeiture of substitute property  
4 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and/or 28  
5 U.S.C. § 2461(c).  
6

7 DATED this 16 day of March, 2021.  
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15 Joseph H. Harrington  
16 Acting United States Attorney

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18 David M. Herzog  
19 Assistant United States Attorney  
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